

Lesley E. Weaver (SBN 191305)
BLEICHMAR FONTI & AULD LLP
555 12th Street, Suite 1600
Oakland, CA 94607
Tel.: (415) 445-4003
Fax: (415) 445-4020
lweaver@bfalaw.com

Derek Loeser (admitted *pro hac vice*)
KELLER ROHRBACK LLP
1201 Third Avenue, Suite 3200
Seattle, WA 98101
Tel.: (206) 623-1900
Fax: (206) 623-3384
dloeser@kellerrohrback.com

Plaintiffs' Co-Lead Counsel

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: FACEBOOK, INC., CONSUMER
PRIVACY USER PROFILE LITIGATION

THIS DOCUMENT RELATES TO:
ALL ACTIONS

Case No. 18-md-02843-VC-JSC

**DECLARATION OF ANNE K. DAVIS IN
SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO SEAL
JOINT DISCOVERY STATEMENT**

I, Anne K. Davis, declare and state as follows:

1. I am an attorney licensed in the State of California and admitted to the United States District Court for the Northern District of California. I am an attorney at Bleichmar Fonti & Auld LLP (“BFA”), Co-Lead Counsel for Plaintiffs in *In re Facebook, Inc. Consumer Privacy User Profile Litigation*, Case No. 18-md-02843-VC (the “MDL”), and a member in good standing of the bar of the State of California and of this Court.

2. This declaration is made in support of Plaintiffs’ Administrative Motion to File under Seal portions of Facebook’s Statement in the parties’ Joint Discovery Statement.

3. Attached hereto as Exhibit A is the parties’ Joint Discovery Statement in unredacted form. The portions of the document sought to be sealed have been highlighted.

4. Attached hereto as Exhibit B is the Joint Discovery Statement in redacted form.

5. Plaintiffs seek to seal portions of Facebook’s section of the Joint Discovery Statement on pages 6 and 7 because the information contained in these paragraphs was designated as “Confidential” by Plaintiffs.

6. Consistent with Rule 79-5(e), Plaintiffs, as the Designating Party, will file a declaration as required by subsection 79-5(d)(1)(A).

7. I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct and to the best of my knowledge. This declaration was executed in Oakland, California.

DATED: August 13, 2020

/s/ Anne K. Davis
Anne K. Davis

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, Lesley E. Weaver, attest that concurrence in the filing of this document has been obtained from the other signatory. I declare under penalty of perjury that the foregoing is true and correct.

Executed Friday, August 13, 2020, at Oakland, California.

s/ Lesley E. Weaver

Lesley E. Weaver

CERTIFICATE OF SERVICE

I, Lesley E. Weaver, hereby certify that on August 13, 2020, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which shall send electronic notification to all counsel of record. I also caused a copy of the under seal filings to be delivered to all counsel of record via electronic mail.

s/ Lesley E. Weaver

Lesley E. Weaver